

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re JOSEPH F. ZIMMERMAN JR. : CHAPTER 13**  
:  
**Debtor(s) : BANKRUPTCY NO. 23-11023**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Joseph F. Zimmerman, Jr., by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **US Bank Trust National Association, not in its Individual Capacity but Solely as Owner Trustee for VRMTG Asse Trust** on July 2, 2025. Debtors believe they can become current on all post-petition payments due under the November 18, 2024 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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